

Attachment 3
STATE OF UTAH
Waiver Extension
Subsequent Eligibility Determination of Training Providers
Workforce Investment Act, Program Year 2005-2006

The Utah Department of Workforce Services (DWS) requests an extension of an existing waiver to work through the subsequent eligibility determination process for training providers through PY2005-PY2006. The history of this waiver is as follows:

- The original waiver was submitted and approved to cover PY2002.
- A waiver extension was submitted and approved for PY2003.
- An additional one-year extension was submitted and approved with Utah's Strategic One Year State Workforce Investment Plan to cover PY2004.

This PY2005-PY2006 extension request will allow testing and completion of a web-based approved training provider database and outcome reporting system for training providers. Please refer to the original waiver enclosed with this abbreviated waiver request.

Utah supports the goals of consumer choice and program accountability as directed in the Workforce Investment Act. Approval of the extension will ensure success in achieving this goal. DWS anticipates final implementation by July 1, 2007.

STATE OF UTAH
Waiver Extension
Subsequent Eligibility Determination of Training Providers
Workforce Investment Act, Program Year 2003

The Utah Department of Workforce Services (DWS) provides the following waiver plan and requests an extension to postpone implementation of the subsequent eligibility determination process for training providers. The extension will provide an opportunity to design and build an online database and reporting system for training providers. Training Providers and DWS customers will have access to the latest training information, eligibility status, on-line provider applications, and current performance reports required for subsequent eligibility. Implementation of the Utah online database and reporting system will improve and enhance access to statewide service provider information in a cost effective way.

Utah supports the goals of consumer choice and program accountability as directed in the Workforce Investment Act and believes approval of the extension will substantially improve success in achieving this goal. Implementation of the subsequent eligibility determination process will continue with a final implementation date of July 1, 2004.

Background

Utah markets the Workforce Investment Act's (WIA) concept of Eligible Training Providers (ETP) and for the most part, has experienced success. However, training providers have consistently indicated reporting requirements are not realistic, based on the limited number of enrollments and the cost of data maintenance. As subsequent eligibility determination approached, many training providers elected not to renew their eligibility. This has created a limited training choice for rural areas and threatened the Individual Training Account System (ITA). The following synopsis presents these challenges and provides a solution that is the basis for the waiver.

Once the period of initial eligibility began, the state worked with local regional workforce investment boards (WIBS) to further educate local area training providers on data collection and the performance requirements of the subsequent eligibility process. Training providers consistently identified several concerns.

- ◆ Creating and maintaining a system that would collect required WIA data would be costly and burdensome, especially for smaller training providers.
- ◆ For many providers, the relatively small number of WIA-eligible participants accessing training services through their ITAs would not justify the resources that would have to be committed to collect required data.
- ◆ Many training providers do not have systems in place or the staff available to produce required performance information in the specified timeframes.

- ♦ The majority of training providers on the Eligible Training Provider List (ETPL) requested extensions primarily, because production data was not available to meet subsequent eligibility requirements.
- ♦ There may be potential violations of data privacy especially related to the Family Educational Rights Privacy Act (FERPA).
- ♦ WIA data requirements might present an additional burden to the amount of data already being collected from students at a time when most businesses, schools, and colleges are trying to streamline processes to be more customer friendly and cost efficient.

Over the last year, potential training providers have acted upon their concerns by simply not completing the provider application. Many current providers have declared they are unable to comply with the requirements for subsequent eligibility certification. The loss of training providers, especially in the state's two-year college system, may have a negative impact in rural areas where the number of eligible training providers is already limited. The lack of eligible training options could virtually shut down the ITA effort in many of Utah's rural (one-stop) employment centers. A waiver to extend the initial period of certification would keep providers on the ETPL and provide customers with training option choices while ETP stakeholders have input in the design and implementation of a workable online system.

At present local WIBs have insufficient data ("all student" data) to make informed decisions about which training providers should be re-certified. Since information on employment and earnings come from the unemployment insurance wage system, there is a tremendous delay in obtaining wage information for the quarter after exit and three quarters after exit. A provider denied subsequent eligibility could consider any decisions made by local board regarding provider's eligibility arbitrary and open to a challenge.

Utah understands the need for accountability and supports efforts to ensure that customers are making informed decisions based on quality data. However, when the ability to effectively collect required data is severely limited, the resulting chaos could destroy customer choice and severely limit the use of Individual Training Accounts (ITAs). The primary goal of this extension is to ensure that the state's adult and dislocated workers are able choose a wide variety of effective and quality training opportunities.

Waiver Plan

The waiver request format follows WIA Section 189(i)(4)(B) and WIA Regulation 661.420.

1. Statutory Regulations to be waived and goals:

WIA Section 122(c)(5) and WIA Regulations at Section 663.530, specifies the time limits for initial eligibility and/or subsequent eligibility. The goal is to design and implement an online database and reporting system to provide performance information, eligibility status and service applications for providers and customers. The system will complement and increase the Strategic Plan efficiency by providing users with up to date training performance information.

2. Describe action the State has undertaken to remove State or local statutory or regulatory barriers:

Utah has implemented the Eligible Training Provider process as required under WIA laws and regulations through State rules R986-600-652 and 653. No additional State requirements have been added to impede this process, but state rules will be amended to reflect any federal waiver approved time frames. Therefore, there are no additional State regulatory barriers that need to be removed.

3. Waiver goals and measurable programmatic outcomes, if the waiver is granted:

- a. Develop and select an efficient and cost effective training provider performance data method that reasonably considers existing “substantially similar” performance data items that may be substituted for required current data items. A solution will alleviate provider concerns involving the type and extent of performance information needed and maintenance cost by including stakeholder suggestions and approval. Developmental progress and stakeholder approval will be monitored. Outcomes will include pre- and post- comparisons.

Utah’s goal is to set criteria for performance data collection, which will ensure required data is obtained while easing the burden of data collection. The expected outcome is to retain current training providers while securing a user-friendly system that will increase the number of new providers to enhance customer choice.

- b. Continue to increase the number of Eligible Training Providers (ETP) and retain those already approved to ensure maximum customer choice. A measurable outcome would be the monitoring of ETP numbers.

Utah currently has over 100 approved training providers. Of those training providers, about 21 are based at a state university, college or center of applied technology. These providers have been the most vocal about the type, amount, and cost of data collection for subsequent eligibility. Our providers have expressed their concern by either choosing not to participate or by not re-applying for subsequent eligibility. The latter applies to most providers that did not receive WIA funded customers.

- c. Maintain the highest level of provider accountability and satisfaction in an error-minimum information system by developing and implementing a customer friendly system. Satisfaction level and error rate monitoring are measurable outcomes.
- d. Continue to develop an online initial eligibility application process that will incorporate stakeholder approval. Include the application process as an enhancement to the ETP Website, with the objective of creating a “one-stop” ETP site. Quantity of site enhancements may be monitored to provide measurable outcomes.

4. Describe any individuals affected by the waiver:

The waiver will impact either directly or indirectly all statewide participant training customers, training service providers, the Utah State WIB, five local regional boards and the general business community. The largest direct impact is anticipated to effect individual training customers and training providers with the former experiencing either the greatest cost or benefit.

5. Describe the processes used to:

(i) Monitor the progress in implementing the waiver:

Progress will be monitored in two phases related to the system's design, development, and implementation. Progress will be measured by the quantity of approvals and completed software programs.

Internet rollout will be monitored by observing the quantity of provider users and DWS customer users. Satisfaction will be monitored to ensure that all users have a quality experience. ETP site enhancement features will be added and monitored.

(ii) Provide notice to any Local Board affected by the waiver:

Although Utah is a WIA single state service delivery area, each of the five regions have local WIBS that have provided waiver development input and approval to Utah's ETP waiver. Final waiver recommendations were provided to the State WIB and their approval has been presented to DOL. As evidenced in the Background section, local and state WIBS as well as the training communities have been involved in the identification of concerns and solutions.

(iii) Provide any Local Board affected by the waiver an opportunity to comment on the request:

Please see item (ii) above. The same local and state WIBS will be employed for any DOL comments, concerns, or approvals.

(iv) Ensure meaningful public comment, including comment by business and organized labor, on the waiver:

Local community and state WIBS have business and organized labor representatives who were provided an opportunity for involvement and comment. Additionally, a general public comment period was provided as of the date of original waiver request. Additional comments received will be immediately forwarded and if appropriate, will be included in the waiver.

Utah appreciates the flexibility afforded to states through the waiver process and anticipates the WIBS waiver plan provides adequate accountability and improved performance for DOL approval.

Attachment 4
STATE OF UTAH
WAIVER REQUEST
WORKFORCE INVESTMENT ACT

The Utah Department of Workforce Services (DWS) provides the following waiver request to allow up to \$700,000 of Workforce Investment Act (WIA) Adult and Dislocated worker formula funds to be transferred into the statewide fifteen (15) percent set-a-side annually. This funding would be in addition to the fifteen (15) percent reserved for statewide activities. The intent is to operate a newly approved Incumbent Worker Program. The waiver request is for program years 2005-2006, if reauthorization of WIA is approved prior to July 1, 2007, the continued need will be evaluated.

The waiver request plan complements Utah's One Year Strategic Plan by concentrating resources among growth areas and thereby provides the necessary incentives for improved employment for incumbent workers. The amount transferred annually would be dependent on the approved employer requests never exceeding \$700,000.

1. Statutory Regulations to be waived: WIA Final Regulations at 20 CFR Sections 667.130 (b)(1). (Of the WIA formula funds allotted for services to youth, adults and dislocated workers, the governor must reserve funds from each of these sources for statewide workforce investment activities. In making these reservations, the Governor may reserve up to fifteen (15) percent from each of these sources...)
2. State or local statutory regulatory barriers: There are no state or local statutory or regulatory barriers to implementing the proposed waiver.
3. Goals to be achieved by the Waiver:
 - Provide growth industry training incentives for career ladder positions of incumbent workers. Utah is currently focusing on the growth industries of Health care, Construction, Manufacturing, and Financial industries to emphasize career ladder.
 - Create a growth cycle for new hired employees and therefore creating employment for dislocated workers.
 - Expect increased State Workforce Investment Board (SWIB) collaboration with growth industry employers to meet industry and worker training needs.
 - Increase flexibility and alternatives in providing a trained workforce for emerging growth industries.

4. Programmatic Outcomes to be achieved by the Waiver:

- **For the Incumbent Worker**
 - i. To retain employment with increased wages by progressing up a career ladder.
 - ii. Develop marketable, transportable skills.
 - iii. Career progression will open up entry-level positions at which time DWS will recruit for.
- **For the Employer**
 - i. Experience an increased productivity due to a better-trained workforce.
 - ii. Increase retention of well-trained workers.
 - iii. Attract better-prepared entry-level workers.
 - iv. Allows employer to be more adaptable to changing labor market technologies.
- **For Utah's Department of Workforce Services**
 - i. Ensures a higher level of performance level attainment.
 - ii. Increased levels of customer satisfaction.
 - iii. Increase resources for targeted industries.
 - iv. Increased effectiveness and efficiency of program resources.
 - v. Increased collaboration and coordination between public and private sector entities.
 - vi. Good overall return on the public workforce investment.

5. Individuals impacted by the waiver:

- Low and medium skilled workers.
- Workers in an occupation whose technology has changed
- Workers who without training may become dislocated.

6. Process used to monitor progress in implementing the waiver:

- Monitor the approved incumbent Worker requests to the available funding per year.
- Reconcile expenditures to approved funding level using standard fiscal reports.

7. Process for notice of local boards and opportunity to comment:

(i) **Provide notice to any Local Board affected by the waiver:**

Although Utah is a WIA single state workforce investment area, each of the state's five administrative regions have local regional councils on workforce services (as created under state law in 1996) that have provided waiver development input and approval to this Waiver plan. Final local waiver recommendations were provided to the State

Workforce Investment Board that approved the waiver as presented to DOL.

- (ii) **Provide any Local Board affected by the waiver an opportunity to comment on the request:**

Refer to Item above explaining Utah's Single State Service Delivery

A 30 day comment period from the date of written notification will be given to allow local regional councils on workforce services an opportunity to provide comments on the Waiver Request. Copies of any comments received will be forwarded to the United States Department of Labor (USDOL).

- (iii) **Ensure meaningful public comment, including comment by business and organized labor, on the waiver:**

A 30-day comment from the date of publication on the jobs.utah.gov website will be given to allow the public opportunity to provide comments on this request. Copies of any comments received will be forwarded to USDOL.

This waiver request to move formula money into statewide funds will allow Utah to administer an Incumbent Worker Program that will meet the established goals as outlined in number 3 above. Details summarized as follows:

- Duration is intended for Program Year 2005-2006, if reauthorization is approved prior to July 1, 2007, the continued need will be evaluated.
- Maximum annual dollar amount to be moved is \$700,000 and is in addition to allowable statewide funds.

Utah appreciates the flexibility afforded to states through the waiver process and anticipates the SWIB waiver plan provides adequate accountability and improved performance for DOL approval.

Attachment 5
STATE OF UTAH
Waiver Request

**WIA Definitions; Low-Income Individual, and Out-of-School Youth
Workforce Investment Act, Program Year 2005 and 2006**

History. Utah's Lieutenant Governor, Olene Walker, assumed the post of Governor from Mike Leavitt when he joined President Bush's Cabinet as Director of the EPA. Governor Walker created "Walker's Work Plan" to guide her, and the State while she's at the helm. One of Governor Walker's initiatives is Transition to Adult Living-TAL, an initiative to improve services and outcomes for youth in foster care, youth aging out of foster care, and youth leaving the juvenile corrections system. (See section titled, "Outcomes of Youth Transitioning From Foster Care," on pages 2 – 6 below). TAL merges nicely with WIA target populations and service expectations after WIA re-authorization. Youth in foster care and juvenile corrections are mentioned in the House of Representatives version of re-authorization, H.R. 1261, and youth from the juvenile justice system are mentioned in the Senate versions of re-authorization, S.1627. This initiative provides a means for Utah to get a 'head start' on re-authorization, and, more importantly, targeting these vulnerable populations is the right thing to do. This initiative holds a dominant place in the Department of Workforce Services Strategic Plan.

Mike Richardson, DWS Service Delivery Support Director, and Richard Anderson, Department of Child and Family Services Director are co-chairing the Transition to Adult Living Implementation Team. DCFS applied for and was granted assistance from the National Governor's Association Policy Academy to assist with the TAL initiative. DWS's participation involves detailed collaboration with DCFS, by including WIA youth services in the initiative.

A TAL pilot project in the DWS North Region has begun. Harold Hess, the North Regional Director has decided to reserve 50% of available WIA youth "slots" for youth in foster care, youth aging out of foster care, and youth leaving the juvenile corrections system. His recommendation is endorsed by both Regional Youth Councils in the North Region, and will be taken to the State Youth Council and State Council for approval at the quarterly meeting, 07/15/04.

The lessons learned from the pilot project will be delivered to the rest of the State for implementation during Program Year 2004. The difficulty this presents to the WIA youth service delivery system is that it increases the struggle to meet the 30% WIA youth expenditure requirement on out-of-school youth. The agreements, pathways, communication, data collection, and staff awareness is being accomplished to help meet the improved outcomes for these youth. The waiver will complete the full support needed for the initiative's success as thus making WIA a full partner in the solution.

Statutory Waiver Request: Utah Department of Workforce Services (DWS) seeks a statewide waiver on the definitions for Low-Income Individual and Out-of-School Youth be changed to reflect the high level of interagency collaboration occurring in Utah, and to benefit the youth represented in the TAL initiative. The altered language is in *bold italics* below.

- 1) WIA law, Section 101 (25), defines a low-income individual as, "(25) Low income individual.--The term "low-income individual" means an individual who--
 - (A) receives, or is a member of a family that receives, cash payments under a Federal, State, or local income-based public assistance program;
 - (B) received an income, or is a member of a family that received a total family income, for the 6-month period prior to application for the program involved (exclusive of unemployment compensation, child support payments, payments described in

subparagraph (A), and old-age and survivors insurance benefits received under section 202 of the Social Security Act (42 U.S.C. 402)) that, in relation to family size, does not exceed the higher of—

- (i) the poverty line, for an equivalent period; or
 - (ii) 70 percent of the lower living standard income level, for an equivalent period;
- (C) is a member of a household that receives (or has been determined within the 6-month period prior to application for the program involved to be eligible to receive) food stamps pursuant to the Food Stamp Act of 1977 (7 U.S.C. 2011 et seq.);
- (D) qualifies as a homeless individual, as defined in subsections (a) and (c) of section 103 of the Stewart B. McKinney Homeless Assistance Act (42 U.S.C. 11302);
- (E) is a foster child on behalf of whom State or local government payments are made, *(or has reached the age of eighteen and has been determined within the 60 month period prior to application for the program involved, to be a foster child on behalf of whom State or local government payments are made)*; or
- (F) in cases permitted by regulations promulgated by the Secretary of Labor, is an individual with a disability whose own income meets the requirements of a program described in subparagraph (A) or of subparagraph (B), but who is a member of a family whose income does not meet such requirements.

- 2) The other recommendation relates to the definition of out-of-school youth. WIA law, Section 101 (33), defines Out-of-school youth as, "(33) Out-of-school youth.--The term "out-of-school youth" means—

(A) an eligible youth who is a school dropout; or

(B) an eligible youth who has received a secondary school diploma or its equivalent but is basic skills deficient, unemployed, or underemployed.

Utah recommends the following addition,

(C) is a foster child, or youth offender, regardless of actual secondary school status.

Benefit. To reach the goal of the TAL initiative to improve the outcomes for these young citizens, it is believed that the current statute does not allow DWS to fully serve the disadvantaged youth aging out of foster care and youth offenders. The waiver will allow Utah to:

- Expand the low-income definition to include youth who have "aged" out of foster care. This provides a means to serve a population who is desperately needy, (according to the outcome data below), and
- Expand the out-of school youth definition to include youth in foster care and offenders, regardless of their secondary school status. This provides a means to serve these youth without limiting access because of the requirement to spend at least 30% of WIA funds on Out-of School Youth.

Outcomes – Current and Expected:

Current Outcomes of Youth Transitioning From Foster Care Demonstrating the Need to Act

Date of Report—05/05/2004

To develop base line information about the current functioning of youth who transitioned from foster care between 1999 and 2004.

Sample

The study sample included 774 (454 females, 320 males) youth

Data Collection Methods

Information was obtained from computer systems of the Department of Human Services, Department of Workforce Services, Department of Health, and Department of Public Safety. Data from public and higher education will be obtained at a later date. The information was integrated into a single database and analyzed across multiple dimensions. Data was limited to youth who reside in the state of Utah. We are unable to obtain information on youth who have moved to another state.

Outcome Variables

The outcome variables that were measured include:

- Wages
- Criminal activity
- Utilization of public assistance
- Child-bearing
- Death rate
- Child support
- Follow-up services

Wages

- The wages reported in Table 1 below represent the average quarterly wages reported by the Department of Workforce Services.
- Wages were reported for 75 percent of the youth.
- Males had significantly higher wages than females.
- The 2004 HHS Poverty Guidelines indicate the annual income of a single individual living at the poverty level is \$9,310 (\$2,327 per quarter).
- Youth who have been out of foster care for 5 years are still living below the poverty level. On average, females who left care in 1999 are living at 59 percent of the poverty level while males are living at 99 percent of the poverty level.
- The low wages reflect the difficulties many of these youth experience in earning an adequate wage to support themselves and obtain economic success.

Table 1: Average Quarterly Wages Reported by the Department of Workforce Services

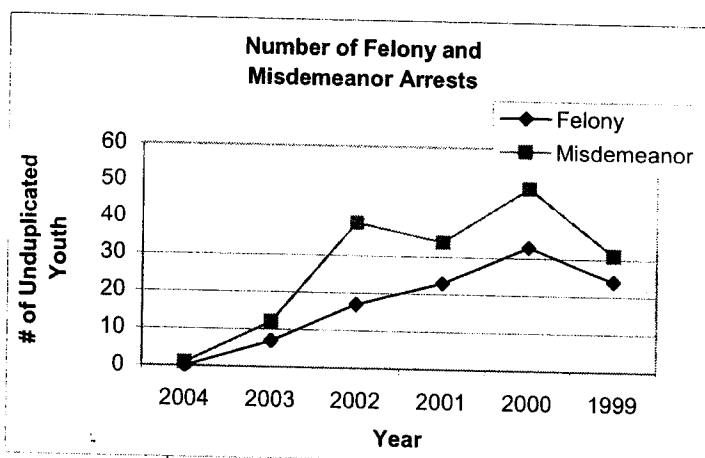
Year		Female	Male	Total
1999	Unduplicated Youth	57	52	109
	Average Wage	1,375.48	2,307.58	1,716.46
2000	Unduplicated Youth	103	79	182
	Average Wage	1,503.01	1,537.68	1,513.05
2001	Unduplicated Youth	92	58	150
	Average Wage	1,225.93	1,451.68	1,291.61
2002	Unduplicated Youth	106	58	164
	Average Wage	868.71	1,155.64	936.53
2003	Unduplicated Youth	79	64	143
	Average Wage	921.09	965.94	939.78
2004	Unduplicated Youth	17	9	26
	Average Wage	619.36	1,211.41	791.25

Criminal Activity

- Thirty-five percent of the youth were arrested for a felony or a misdemeanor; 21 percent were arrested for a misdemeanor and 14 percent were arrested for a felony.
- Except for the youth who left foster care in 1999, the criminal activity of youth tends to increase over time.

Table 2: Number of Felony and Misdemeanor Arrests

Year	Felony	Misdemeanor	Total
1999	24	31	55
2000	33	49	82
2001	23	34	57
2002	17	39	56
2003	7	12	19
2004	0	1	1
TOTAL	104	166	270



Public Assistance

- Fifty-eight percent (450) of the youth have received some type of public assistance.
- Food stamps are the most utilized service – 43 percent of the youth have received food stamps.

Table 3: Utilization of Public Assistance

Program	1999	2000	2001	2002	2003	2004	Total
Child Care	12	29	11	7	4	1	64
Disabled Medicaid	10	10	13	5	6	1	45
Family medical	17	43	23	16	7	2	108
Food Stamps	51	98	73	56	56	2	336
General Assistance	14	23	24	18	10	0	89
Newborn Medical	1	1	3	24	23	0	52
Pre-natal Medical	21	43	32	31	15	0	142
Primary Care Network	25	26	37	23	10	0	121

TANF Financial	14	46	19	17	9	1	106
Total Services Utilized	165	319	235	197	140	7	1,063

Child Bearing

- The birth rate for females who left foster care in the last five years is 2.79 times the rate for females in the general population. Over 32 percent of the former female foster youth have had a child.
- Only 9 percent of the males have fathered a child.

Table 4: Female Birth Rate: Age 18-24

Female Population	Number of Births	Population of Females	Birth Rate per 1,000
General Population	90,767	782,732	115.96
Former Foster Youth	147	454	323.78

Death Rate

- Three males who transitioned from foster care in the last 5 years have died – 2 from suicide and one as a result of a traffic accident. Although these numbers are small, they present a significantly greater death rate than for youth in the general population. The suicide rate for former foster youth is 17 times higher than the rate for the general population and the death rate from accidents 4 times higher than the general population.
- The primary cause of death for the general population is accidents followed by suicide. The reverse is true for youth transitioning from foster care.

Table 5: Death Rate: Age 18-24

Population	# of Suicides	Suicide Rate/100,000	# of Accidents	Accident Rate/100,000
General Population (1,539,227)	237	15.4	484	31.44
Former Foster Youth (774)	2	258.4	1	129.2

Child Support

- Nineteen percent of the females and 5 percent of males who transitioned from foster care have received child support from the Office of Recovery Services.
- Twenty-one (3 percent) former foster youth are paying child support to the Office of Recovery because their child is placed in foster care.

Implications

- Despite the best efforts of caseworkers, educators, foster parents and others, many of the youth transitioning from foster care have poor outcomes and are struggling to be self-supporting adults.
- The good news is that many of the outcome variables can be addressed by targeting comprehensive and coordinated services in the following areas:
 - Job training and employment
 - Post secondary education and training
 - Improved reading and math skills
 - Pregnancy prevention
 - Access to health and mental health services

WIA Outcomes Among Targeted Youth

While WIA has not specifically targeted youth in these Utah populations before, a number of participants are former foster care and juvenile corrections youth. Accordingly, MIS has attempted to calculate outcomes for these sub-groups.

Utah WIA I-B Performance Measures - Youth			Program Year Cycle		Below 80% of Planned Level			
DOL Report Quarter: PY03 - Q2			Ut Wage Match Cycle		Between 80% to 100% of Planned Level			
Data Run: 3/15/2004								
			Actual PY03	Ut PY03	UT WAGE MATCH			
	Timeframe		Entered Level	Planned Level	All Youth	Foster Child	Offender	Non-Offender
09	Older Youth Entered Employment	10/1/2002 - 3/31/2003	63.0%	65.0%	82.6%			78.9%
10	Older Youth Employment Retention	10/1/2001 - 9/30/2002	80.0%	80.8%	83.0%			85.1%
11	Older Youth Earnings Change	10/1/2001 - 9/30/2002	\$3,071	\$2,400	\$2,741			\$2,934
12	Older Youth Credential	10/1/2002 - 3/31/2003	52.0%	45.0%	57.1%			54.2%
13	Younger Youth Skill Attainment	7/1/2003 - 12/31/2003	85.0%	89.0%	87.8%	91.9%	86.8%	88.9%
14	Younger Youth Diploma Attainment	7/1/2003 - 9/30/2003	45.0%	51.0%	77.6%	76.9%	77.8%	70.0%
15	Younger Youth Retention	10/1/2001 - 9/30/2002	52.0%	55.0%	71.1%	81.3%	69.6%	68.8%
16	Participant Satisfaction - VMA	7/1/2003 - 9/30/2003	78.00	76.80	70.00	63.00	69.00	61.00
17	Employer Satisfaction	7/1/2003 - 9/30/2003	76.00	76.80	73.00	73.00	73.00	73.00
Total O Participants		7/1/2003 - 12/31/2003			294			68
Total Y Participants		7/1/2003 - 12/31/2003			1042	147	895	249
Total O Exiters		7/1/2003 - 9/30/2003			36			12
Total Y Exiters		7/1/2003 - 9/30/2003			135	26	109	48

The above chart indicates that the youth-offender population does not have lower rates of entered employment; however, rates of retention and earnings change are significantly lower than for non-offender youth. Likewise, skill attainment rates for younger youth are not lower but employment retention rates are notably less.

It should be noted that the WIA outcomes summary above is based on case management notations in the file and are not based on actual matches with the DCFC system. A more complete match may reveal different outcomes. Further, *indicators of status as a former foster child are not available; therefore, complete analysis of outcomes for former foster care youth in the Older Youth program is not possible.*

Expected Outcomes:

It is the expectation of the TAL initiative partners to improve the outcomes of the foster care and correction youth to at a minimum meet the same success of youth not disadvantaged by being part of foster care and/or corrections systems.

Monitoring:

DWS will monitor the outcomes for these youth as compared to other youth enrolled in WIA services. Data will be collected for the reporting outcomes for WIA services. For the purposes of these waivers, the youth impacted by the waivers will be reviewed to observe their achievements as the waiver group compared to the whole group.

Local Board and Public Comment:

Requirements to inform and allow comment from the Local Boards and public have been met according to 661.420, (c), iii and iv. This Waiver Request will be placed on the DWS Internet site at <http://jobs.utah.gov>, and announced as a Public Notice in the following Utah newspapers for a thirty day comment period beginning 07/12/04:

- Salt Lake Tribune
- Deseret News
- Ogden Standard Examiner
- Provo Herald